

EXHIBIT B-2

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

AL'S DISCOUNT PLUMBING;
ACCURATE BACKFLOW AND
PLUMBING SERVICES, INC.;
HOMESTEAD HEATING &
PLUMBING, LLC; AIRIC'S
HEATING & AIR CONDITIONING,
INC.; PRIME SOURCE PLUMBING
& HEATING CORP.; RYAN
PLUMBING, INC.; MAZZOLA
PLUMBING HEATING & GAS
FITTING, INC.; SOUTH SHORE
HEATING AND PLUMBING, INC.;
ALL KNIGHT PLUMBING,
HEATING AND AIR
CONDITIONING, INC.; PLUMB
PERFECTION, LLC, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

VIEGA LLC,

Defendant.

Case No: 19-cv-00159

Honorable Christopher C. Conner

Electronically Filed

**DECLARATION OF MARC H. EDELSON, ESQUIRE IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT AND
ATTORNEYS' FEES, EXPENSES AND SERVICE AWARD**

I, Marc H. Edelson, Esq., hereby declare and state as follows:

1. I am a partner at the law firm of Edelson & Associates, LLC (the "Firm"). I submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement and Attorneys' Fees, Expenses and Service Award. I have personal knowledge of the information set forth in this Declaration.

2. Over the course of this Action, Counsel have successfully navigated Plaintiff and the Class through a fully briefed motion to dismiss, nearly complete discovery of class representatives, extensive merits discovery, and mediation resulting in settlement.

3. The attorneys from my Firm that have worked on this Action are Marc H. Edelson, Liberato Verderame and Zakiya Washington. Under the direction of Interim Class Counsel, the Firm undertook the following assignments: document review.

4. Not including the time expended in preparing the application for fees and expenses, the table below details the hours billed and the amount billed at average historical rates for these attorneys along with a collective entry for the Firm's paralegals:¹

<u>Attorney</u>	<u>Hours Billed</u>	<u>Amount</u>	<u>Hourly Rate</u>
Marc H. Edelson	20.20	\$16,160.00	\$800.00
Liberato Verderame	40.00	\$24,000.00	\$600.00
Zakiya Washington	377.80	\$132,230.00	\$350.00
Total	438.00	\$172,390.00	

This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. The hourly rates for the attorneys and professional support staff at my firm are the usual and customary hourly rates charged and have been approved by federal and state courts nation-wide.


¹ If the Court wishes, the Firm can provide more detailed time entries describing the work of these attorneys and paralegals, as well as the Firm's expenses.

6. During the course of this Action, the Firm incurred \$50.00 in unreimbursed billable expenses. These expenses were incurred and tracked in the Firm's normal course of business. The chart below details the expenses incurred by category:

CATEGORY	EXPENSE AMOUNT
Copying, Printing and Scanning	
Telephone and Conference Calls	
Messenger and delivery services	
Service of Process	
Carfare, Travel and Meals	
Expert Fees	
Court Reporters and Transcripts	
Legal Research and Filing Fees	\$50.00
Mediators	

I hereby declare under penalty of perjury that above is true and correct to the best of my knowledge.

Dated: November 3, 2020



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